

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

SYMBOLITY INNOVATIONS, LLC,

Plaintiff,

v.

**ALEXANDER MCQUEEN TRADING
AMERICA, INC., BOTTEGA VENETA,
INC., and YVES SAINT LAURENT
AMERICA, INC.**

Defendants.

CIVIL ACTION NO. 3:23-cv-1755-L-BN

**CONSOLIDATED WITH CIVIL
ACTION Nos.: 3:23-cv-1902-L and
3:23-cv-1881-L**

JURY TRIAL DEMANDED

**JOINT STATUS REPORT AND REQUEST
TO KEEP THE CASE ADMINISTRATIVELY CLOSED**

Plaintiff Symbology Innovations, LLC and Defendants Alexander McQueen Trading America, Inc., Bottega Veneta, Inc., and Yves Saint Laurent America, Inc. (collectively “the Parties”) respectfully submit this Joint Status Report and Request to Keep the Case Administratively Closed.

The Parties notify the Court that they are still negotiating the terms of their settlement and respectfully request the Court to keep these consolidated cases administratively closed for another 30 days up to and including May 15, 2024 to allow the Parties to finalize their resolution of these lawsuits, including the submission of a Motion to Dismiss. This request is not for delay, but only to allow for an orderly resolution of these lawsuits.

Dated: April 15, 2024

Respectfully Submitted,

/s/ Christopher A. Honea

Christopher A. Honea
Texas Bar No. 24059967
chonea@ghiplaw.com
M. Scott Fuller
Texas Bar No. 24036607
rgarbeiter@ghiplaw.com

GARTEISER HONEA, PLLC
119 W. Ferguson Street
Tyler, Texas 75702
Telephone: (903) 705-7420
Facsimile: (903) 405-3999

COUNSEL FOR PLAINTIFF

/s/ Jared D. Eisenberg

Christopher J. Schwegmann
Texas State Bar No. 24051315
cschwegmann@lynllp.com
Jared D. Eisenberg
Texas Bar No. 24092382
jeisenberg@lynllp.com

LYNN PINKER HURST & SCHWEGMANN, LLP
2100 Ross Avenue, Suite 2700
Dallas, TX 75201
Telephone: 214-981-3800
Facsimile: 214-981-3839

Joshua B. Long (SBN 24078876)
KELLEY DRYE & WARREN LLP
515 Post Oak Boulevard, Suite 900
Houston, Texas 77027
Telephone: (713) 355-5000
Facsimile: (713) 355-5001
Emails: jlong@kellydrye.com

Michael J. Zinna (Admitted Pro Hac Vice)
Vincent M. Ferraro (Admitted Pro Hac Vice)
KELLEY DRYE & WARREN LLP
3 World Trade Center
New York, New York 10007
Telephone: (212) 808-7800
Facsimile: (212) 808-7897
Email: mzinna@kellydrye.com
Email: vferraro@kellydrye.com

Attorneys for Defendants Yves Saint Laurent America, Inc., Alexander McQueen Trading America, Inc., and Bottega Veneta, Inc.